

August 31, 2020

The Honorable Jesse M. Furman
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

RE: Status Report in *State of New York v. Wolf, et al.*, 20 Civ. 1127 (S.D.N.Y.), and
Lewis-McCoy v. Wolf, et al., 20 Civ. 1142 (S.D.N.Y.).

Dear Judge Furman,

The parties respectfully write in response to the Court's August 27, 2020 order requesting that the parties update the Court on the status of their good-faith settlement negotiations. The parties have worked diligently and in good faith but have not been able to reach a resolution on all terms of a proposed consent judgment. Notwithstanding the parties' continued efforts, consensual resolution of these matters is not likely and continued deferral of action on Plaintiffs' unopposed motion for partial summary judgment appears unnecessary. Counsel for Defendants have been informed that CBP is working to remediate the residual effects of the rescinded policy at issue in this litigation.

Respectfully submitted,

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